

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

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ETHICON WAVE 12 CASES LISTED IN  
EXHIBIT A

JOSEPH R. GOODWIN  
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF  
JOSEPH CARBONE, M.D. FOR WAVE 12**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion and memorandum filed in relation to Joseph Carbone for Ethicon Wave 1, Dkt. 2025 (motion), 2027 (memorandum in support); and the reply brief filed in Ethicon Wave 3, Dkt. 3036. Plaintiffs respectfully request that the Court exclude Joseph Carbone's testimony, for the reasons expressed in the Wave 1 and Wave 3 briefing. This notice applies to the following Wave 12 cases identified in Exhibit A attached hereto.

Dated: October 28, 2019

Respectfully submitted,

/s/ D. Renee Baggett

Renee Baggett, Esq.

Bryan F. Aylstock, Esq.

Aylstock, Witkin, Kreis and Overholtz, PLC

17 East Main Street, Suite 200

Pensacola, Florida 32563

(850) 202-1010

(850) 916-7449 (fax)

E-mail: [rbaggett@awkolaw.com](mailto:rbaggett@awkolaw.com)

/s/ Thomas P. Cartmell

THOMAS P. CARTMELL

Wagstaff & Cartmell LLP

4740 Grand Avenue, Suite 300

Kansas City, MO 64112

816-701-1102

Fax 816-531-2372

[tcartmell@wcllp.com](mailto:tcartmell@wcllp.com)

## **EXHIBIT A**

Dice, Denese	2:13-cv-03184
Ekici, Gulfinaz	2:17-cv-01948
Gilstrap, Patricia	2:16-cv-00236
Graves, Tina	2:12-cv-07177
Hicks, Susan	2:17-cv-01971
Kirby, Sherry	2:16-cv-00238
McGathey, Elizabeth	2:12-cv-01538
Shea-Towers, Deborah	2:13-cv-01540
Vigneau, Christine	2:17-cv-04364

**CERTIFICATE OF SERVICE**

I hereby certify that on October 28, 2019, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett  
D. RENEE BAGGETT  
Aylstock, Witkin, Kreis and Overholtz, PLC  
17 E. Main Street, Suite 200  
Pensacola, FL 32563  
850-202-1010  
850-916-7449  
[Rbaggett@awkolaw.com](mailto:Rbaggett@awkolaw.com)